

**UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Bankr. No. 19-22653 TPA
STEPHEN R. HANEY AND AMY)	
L. HANEY,)	Chapter 13
Debtors.)	
)	Docket No. 61
QUICKEN LOANS,)	Related to Docket No.
)	
Movant,)	Hearing Date & Time:
)	
vs.)	Claim No. 4
)	
STEPHEN R. HANEY, AMY L.)	
HANEY AND RONDA J.)	
WINNECOUR, CHAPTER 13)	
13 TRUSTEE,)	
Respondents.)	

DECLARATION OF MORTGAGE PAYMENT CHANGE

And Now, comes the Debtors, Stephen R. Haney and Amy L. Haney, by and through their attorney, who respectfully represents the following:

1. On or about June 30, 2019, Debtors filed for protection under Chapter 13 of the U.S. Bankruptcy Code.
2. This Notice is being filed to notify the Chapter 13 Trustee of the change in mortgage payment amount.
3. Quicken Loans has filed a Notice of Mortgage Payment Change. The monthly mortgage payment of **\$994.56** is being **increased** to **\$997.46** effective **12/1/2020**.
4. In all other respects the Declaration that was filed shall remain the same.

WHEREFORE, the Debtor requests that this Honorable Court permit the Chapter 13 Trustee to immediately make the monthly mortgage payment according to the above referenced Notice of Mortgage Payment Change commencing with the next distribution in the effective amounts.

Date: 11/19/2020

Respectfully submitted.
/s/ Rodney D. Shepherd
Rodney D. Shepherd, Esquire
Attorney for the Debtors
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CERTIFICATE OF SERVICE

I, Rodney D. Shepherd, attorney for the Debtors, hereby certifies that a true and correct copy of the Declaration of Mortgage Payment Change was served on the 19th day of November, 2020, by Electronic Filing, upon the following:

Ronda J. Winnecour, Esquire
Chapter 13 Trustee
cmecf@chapter13trusteewdpa.com

Quicken Loans
Attn: Brian C. Nicholas, Esquire
bnicholas@kmlawgroup.com

By: /s/ Rodney D. Shepherd
Rodney D. Shepherd
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